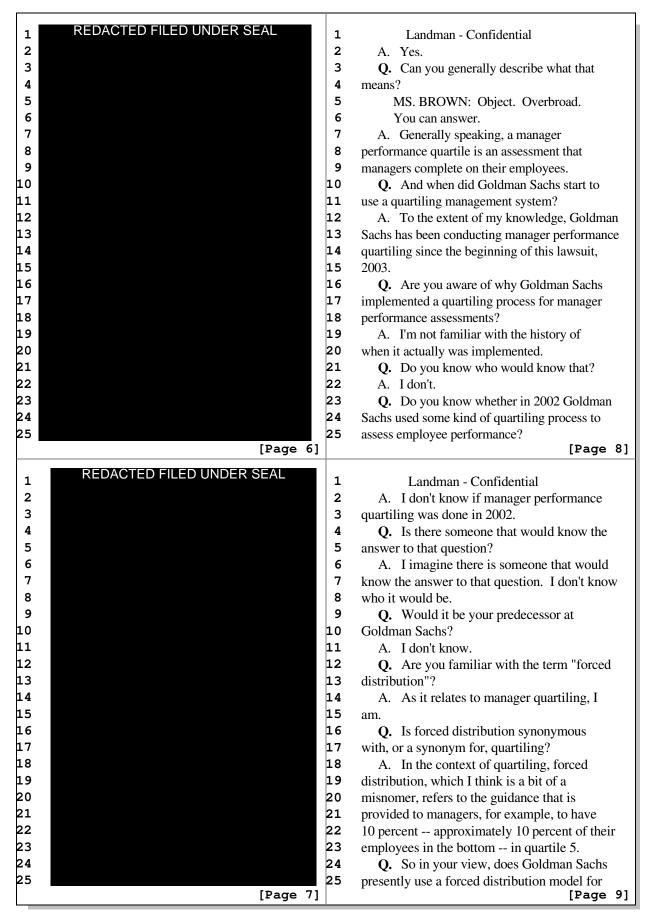
EXHIBIT 10A

CONFIDENTIAL	
	[Page 1]
** CONFIDENTIAL **	
IN THE UNITED STATES DISTRICT COURT	
FOR THE SOUTHERN DISTRICT OF NEW YORK	
NO. 10-CV-069050(JMF)(JCF)	
H. CHRISTINA CHEN-OSTER; LISA PARISI	
and SHANNA ORLICH,	
Plaintiffs,	
-against-	
GOLDMAN, SACHS & CO. and	
THE GOLDMAN SACHS GROUP, INC.,	
Defendants.	
DEPOSITION OF DAVID LANDMAN	
New York, New York	
Thursday, October 10, 2013	
Reported by:	
JEFFREY BENZ, CRR, RMR	
JOB NO. 112175	

Case 1:10-cv-06950-AT-RWL Document 265-15 Filed 07/25/14 Page 3 of 14 CONFIDENTIAL

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                                                               PAUL HASTINGS LLP
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                   October 10, 2013
                                                               Attorneys for Defendants
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                   9:53 a.m.
                                                                  75 East 55th Street
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                                                                  New York, New York 10002
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                                                               BY: BARBARA BERISH BROWN, ESQ.
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        Deposition of DAVID LANDMAN, pursuant to
                                                                  barbarabrown@paulhastings.com
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     30(b)(6) Notice, held at the offices of Outten &
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                                                                     -and-
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     Golden LLP, 3 Park Avenue, New York, New York,
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     before Jeffrey Benz, a Certified Realtime
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     Reporter, Registered Merit Reporter and Notary
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                                                                  202.551.1717
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     Public of the State of New York.
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                                                            ALSO PRESENT:
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                                                               REGINA S. PALUMBO, ESQ., Goldman Sachs
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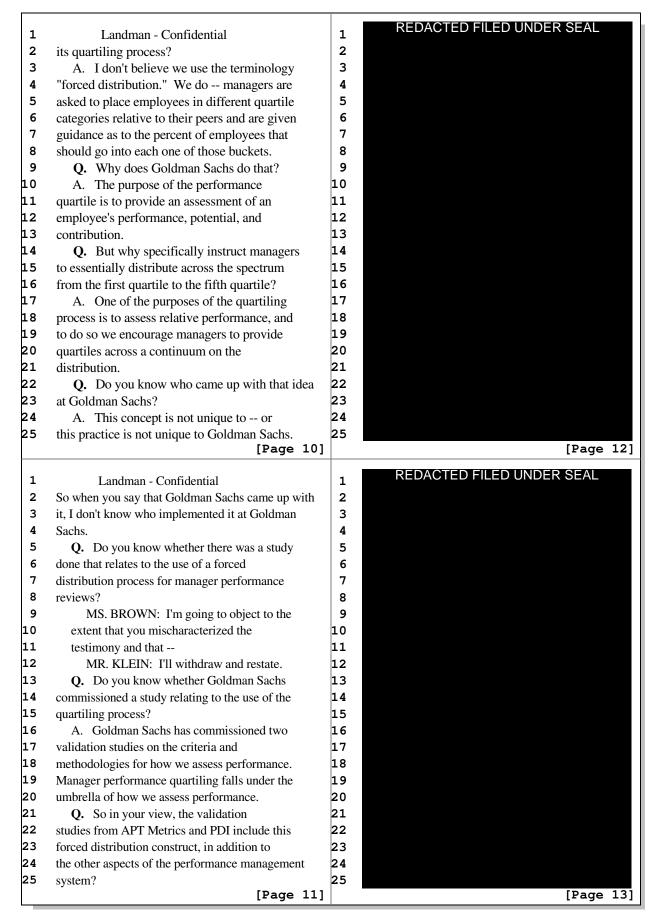
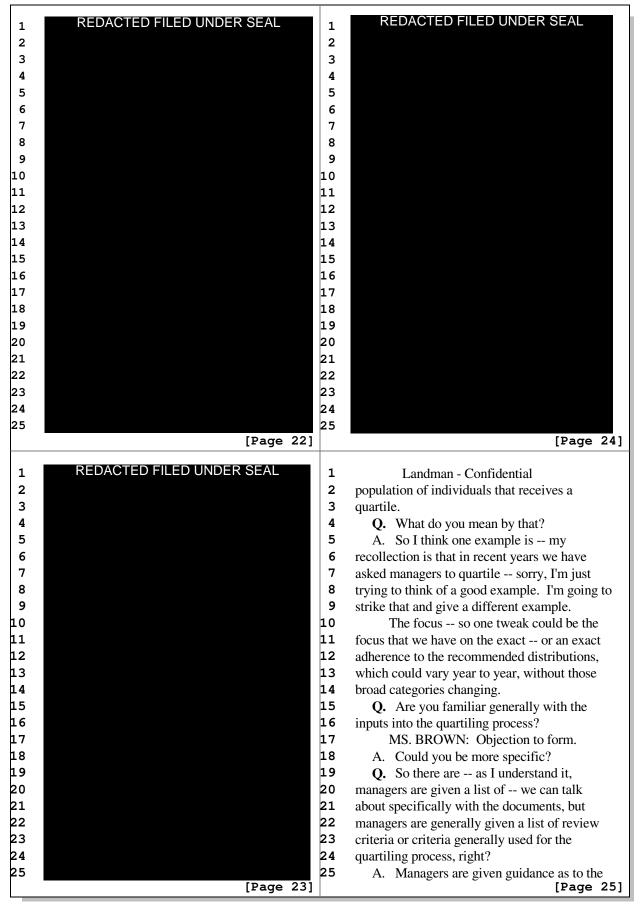


EXHIBIT 10A - TRANSCRIPT OF THE DEPOSITION OF DAVID LANDMAN DATED OCTOBER 10, 2013 (PAGES 14-21)



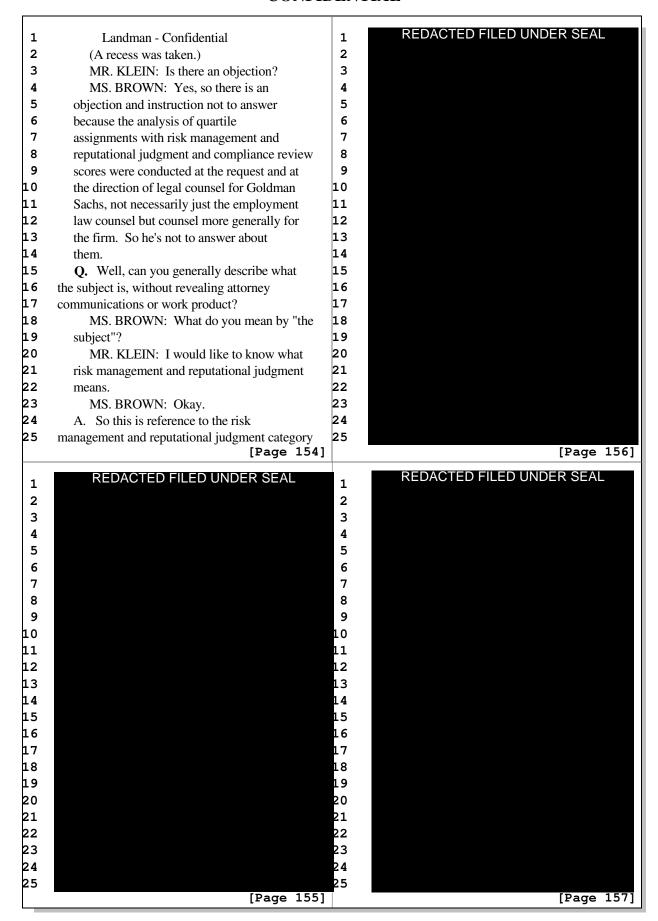
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[Page 27] [Page 29]	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	A. The feedback received via the 360 review process is an input for managers to consider as they make their quartile determinations. Q. You're familiar with the 360 review process whereby managers review their subordinate employees; is that right? MS. BROWN: Object. Misstates the testimony. Q. I'll withdraw and restate. In the 360 review process has a part of that process, rather, is the manager reviews the subordinate employee, right? A. Managers do provide feedback to their employees as part of the 360 review process. Q. Would that manager feedback of a subordinate employee match the quartiling review criteria? MS. BROWN: Object to the form. Vague. Also, 360 was covered in the last	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	
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EXHIBIT 10A - TRANSCRIPT OF THE DEPOSITION OF DAVID LANDMAN DATED OCTOBER 10, 2013 (PAGES 30-93)

1	REDACTED FILED UNDER SEAL	1	Landman - Confidential
2		2	and HCM can advise them to help them make those
3		3	considerations at the divisional HCM level.
4		4	Q. Does TAG evaluate the degree to which
5		5	the 360 review score agrees or disagrees with
6		6	
		7	the quartiling rank?
7			MS. BROWN: Again, if there's any
8		8	privilege request that's made of you in
9		9	that connection, you're not to answer about
10		10	that, but otherwise you can.
11		11	A. And beyond that, no, we do not.
12		12	Q. So there's no similar document, like
13		13	the 2011 performance quartile distributions,
14		14	that would assess agreement between the 360
15		15	review score and quartile?
16		16	MS. BROWN: Object to the form.
17		17	Mischaracterizes the evidence.
18		18	A. Beyond anything that is privileged,
19		19	TAG has not produced, as far as I'm aware, any
20		20	document comparing the manager or 360 scores
21		21	to the manager performance quartile.
22		22	Q. Next bullet point is, "Assess
23		23	
			potential for future contribution to the firm by
24		24	considering factors such as skill set,
25	[Page 94]	25	managerial capacity, and breadth of ability."
	[rage 94]		[Page 96]
		1	
1	Landman - Confidential	1	Landman - Confidential
1 2	Landman - Confidential	1 2	Landman - Confidential Do you see that reference?
2	score is is reviewed by the company?	2	Do you see that reference?
2	score is is reviewed by the company? MS. BROWN: I object to the form.	2	Do you see that reference? A. I do.
2 3 4	score is is reviewed by the company? MS. BROWN: I object to the form. Misstates the testimony.	2 3 4	Do you see that reference? A. I do. Q. And is that are those terms the
2 3 4 5	score is is reviewed by the company? MS. BROWN: I object to the form. Misstates the testimony. A. So, right, I do not speak to a	2 3 4 5	Do you see that reference? A. I do. Q. And is that are those terms the product of a validation study, or how are they
2 3 4 5 6	score is is reviewed by the company? MS. BROWN: I object to the form. Misstates the testimony. A. So, right, I do not speak to a specific score that's provided, but managers,	2 3 4 5 6	Do you see that reference? A. I do. Q. And is that are those terms the product of a validation study, or how are they determined?
2 3 4 5 6 7	score is is reviewed by the company? MS. BROWN: I object to the form. Misstates the testimony. A. So, right, I do not speak to a specific score that's provided, but managers, once again, should take into consideration the	2 3 4 5 6 7	Do you see that reference? A. I do. Q. And is that are those terms the product of a validation study, or how are they determined? MS. BROWN: This has been asked and
2 3 4 5 6 7 8	score is is reviewed by the company? MS. BROWN: I object to the form. Misstates the testimony. A. So, right, I do not speak to a specific score that's provided, but managers, once again, should take into consideration the 360 feedback, and of course their summary of	2 3 4 5 6 7 8	Do you see that reference? A. I do. Q. And is that are those terms the product of a validation study, or how are they determined? MS. BROWN: This has been asked and answered.
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EXHIBIT 10A - TRANSCRIPT OF THE DEPOSITION OF DAVID LANDMAN DATED OCTOBER 10, 2013 (PAGES 98-149)

1	REDACTED FILED UNDER SEAL	1	Landman - Confidential
2		2	details on this population including the process
3		3	for the divisional LOA review is attached."
4		4	Do you know what the reference is to?
5		5	A. LOA in this instance is referring to
6		6	somebody who has been on a leave of absence.
7		7	Q. And are there rules relating to when
8		8	an employee on that leave of absence would be
9		9	excluded from quartile from the quartiling
10		10	
11			process?
		11	A. The rules regarding the populations to
12		12	be included and excluded from receiving a
13		13	quartile and included or excluded from being
14		14	part of the so-called quartile distribution are
15		15	contained in the various guidelines we've been
16		16	going through, and would have been attached to
17		17	this e-mail.
18		18	Q. Go back to the second bullet point,
19		19	the ER\ELG quartile change reference, does that
20		20	signify that ER\ELG can, in fact, require
21		21	quartile changes?
22		22	MS. BROWN: You're not to describe the
23		23	process.
24		24	If you know the answer to whether
25		25	those groups require changes, you can
	[Page 150]		[Page 152]
		_	
1	Landman - Confidential	1	Landman - Confidential
2	Do you see that?	2	answer.
3	A. I do see that.	3	A. My understanding is that these groups
4	Q. What does that refer to?	4	provide advice to managers, ultimately which
5	MS. BROWN: Again, if you're not to	5	managers decide make their own decisions
6	discuss any privileged project or advice.	6	based on that advice.
7	If you know about business decisions	7	Q. You would agree, however, that the
8	that are made after that advice has been	8	phrasing here is inconsistent with your answer?
9	given, you can testify to those.	9	A. That's I do agree that the phrasing
10	A. So this statement should be brought	10	is inconsistent, I think this is a an
11	into business business business required	11	overstatement.
12	or business made quartile changes will require	12	Q. Next box is, "This year a comparative
13	replacements, which means the business wants to	13	analysis of the manager quartile assignments
14	change somebody from a Q 4 to a Q 5, they should	14	with both the risk management and reputational
15	change somebody else from a Q 5 to a Q 4.	15	judgment and compliance review scores will be
16	Q. Is there a log of changes that	16	conducted."
17	where somebody is removed from Q 5 or some other	17	What does that mean?
18	place within the quartile process?	18	MS. PALUMBO: Adam, can you go off the
19	MS. BROWN: This has been asked and	19	record for a minute here?
20	answered several times.	20	MR. KLEIN: Can we have an answer to
21	A. And once again, that information is	21	this question?
22	contained in CRS.	22	MS. PALUMBO: There's an issue about
23	Q. Next bullet point is, "A small	23	privilege. That's why I don't think there
24	population of LOAs will be excluded from the	24	can be an answer.
25	quartile distribution this year. Further	25	MR. KLEIN: Okay.
			ITILL INCLUING CINEY.
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[40] (Pages 154 to 157)

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